Nos. 17-1717, 18-18

In The Supreme Court of the United States

AMERICAN LEGION, *et. al.*,
Petitioners,
v.
AMERICAN HUMANIST ASS'N, *et. al.*,
Respondents.

MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION,
Petitioner,
v.
AMERICAN HUMANIST ASS'N, *et. al.*,
Respondents.

On Writs of Certiorari to the U.S. Court of Appeals for the Fourth Circuit

BRIEF *AMICI CURIAE* FOR THE MILITARY RELIGIOUS FREEDOM FOUNDATION AND SIXTEEN HIGH-RANKING MILITARY OFFICIALS AND VETERANS IN SUPPORT OF RESPONDENTS

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INTERESTS OF AMICI CURIAE[1]

The Military Religious Freedom Foundation (MRFF) is dedicated to ensuring that all members of the United States Armed Forces fully receive the Constitutional guarantees of religious freedom to which they and all Americans are entitled by virtue of the Establishment Clause of the First Amendment. MRFF currently represents approximately 61,000 clients, including active duty U.S. marines, sailors, soldiers, airmen, cadets, midshipmen, National Guard, reservists and veterans, including matters involving high school JROTC. Approximately 95% of MRFF's clients self-identify as practicing Christians.

MRFF recognizes that military life requires individual adherence to shared patriotic principles. MRFF also recognizes the need for military personnel to at times temporarily relinquish some Constitutionally granted personal freedoms for the sake of military discipline and objectives. MRFF believes that religious faith is a Constitutionally guaranteed freedom that must never be compromised, except in the most limited of military circumstances, because of its fundamental importance to the preservation of the American nation and the American

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[1] Pursuant to Supreme Court Rule 37.6, amici curiae affirm that no counsel for a party authored this brief in whole or in part, that no counsel or a party made a monetary contribution intended to the preparation or submission of this brief and no person other than amici curiae, their members, or their counsels made a monetary contribution to its preparation or submission. Both Petitioner and Respondent filed blanket consent to the filing of amicus curiae briefs, both of which are on file with the clerk.

way of life. MRFF adheres strongly to the principle that religious faith is a deeply personal matter, and that no American has the right to question another American's beliefs as long as they do not unwontedly intrude on the public space or the privacy or safety of another individual.

***

The Army and Air Force officials and veterans signing this brief are committed to maintaining the cohesiveness of the United States military by preserving the right of all servicemembers to exercise their religious beliefs without fear of discrimination, persecution, or harassment by military officials. The Army and Air Force officials and veterans who have signed this brief include:

Michael "Mikey" Weinstein, *President and Founder, Military Religious Freedom Foundation*

Robert Muller, *Founder, Vietnam Veterans of America; Co-Founder, International Campaign to Ban Landmines, Nobel Peace Prize (1997); MRFF Advisory Board Member*

Richard G. Harding, *Lieutenant General; 16th Judge Advocate General, United States Air Force (ret.)*

William T. "Bill" Lord, *Lieutenant General; Former Chief Information Officer, United States Air Force (ret.)*

Irving "Irv" Halter, *Major General, United States Air Force (ret.)*

John Compere, *Judge, Brigadier General, United States Air Force (ret.); MRFF Advisory Board Member*

Martin France, *Brigadier General, United States Air Force (ret.); MRFF Advisory Board Member*

Andrew E. Salas, *Brigadier General, United States Air Force*
Vincent R. Lindenmeyer, *Colonel, Ph.D., United States Army (ret.)*

Richard L. Klass, *Colonel, United States Air Force (ret.)*

Quentin D. Collins, *Colonel, United States Air Force (ret.); MRFF Advisory Board Member*

Lawrence "Larry" Wilkerson, *Colonel, United States Army (ret.); MRFF Advisory Board Member*

Rabbi Joel Schwartzman, *Colonel, United States Air Force (ret.)*

David Antoon, *Colonel, United States Air Force (ret.)*

Gregory J. Petrequin, *Colonel, United States Army (ret.)*

Cynthia R. Lindenmeyer, *Reverend Doctor Chaplain, American Public University System (ret.), commissioned as a U.S. Army officer*

Full biographies for each signee can be found in Appendix I.

***

Amici submit this brief to illustrate how the dissolution of military cohesiveness is not only harmful to individual servicemembers, but also dangerous to our national security. Amici emphasize that the United States military cannot fulfill its mission of preserving national security and protecting citizens if government officials are engaging in actions that promote religious favoritism, encourage exclusion and create an environment where servicemembers are subject to harassment while in service to this country.

SUMMARY OF THE ARGUMENT

The Department of Defense has long recognized that "discrimination against persons or groups based on ... religion ... is contrary to good order and discipline and is counterproductive to combat readiness and mission accomplishment." Department of Defense Directive 1350.2 §4.2 (Aug. 18, 1995). Religious preference, harassment, and discrimination are examples of the kinds of divisiveness that can threaten military functions, and that were brought before this Court in *Salazar v. Buono*:

> Nothing is more important to military functioning than internal cohesion. When soldiers trust one another and feel a common sense of patriotism and purpose, the military is able to function effectively and achieve its many challenging aims...[b]ut military cohesion can be easily imperiled by

> discrimination, prejudice, and subtler exclusionary practices.

Brief of Former High-Ranking Military Officials Colonel David Antoon, Brigadier General Israel Drazin, Vice Admiral Bernard Kauderer, Colonel Richard L. Klass, Brigadier General A.A. "Tony" Verrengia, and Colonel Lawrence B. Wilkerson, *Salazar v. Buono*, 559 U.S. 700 (2010) (No 08-472) at 18-19.

This Brief presents three arguments to show that permitting the Bladensburg cross to stand as a state-sponsored memorial to fallen servicemembers harms military cohesion: (1) the military is a religiously diverse institution; (2) servicemembers who do not identify as Christian have been ostracized by fellow servicemembers as well as military leaders who impermissibly promote the Christian faith over others; and (3) the history of excluding non-Christians from the Bladensburg cross leads to the impermissible and damaging perception that our government endorses such exclusion and preferential treatment.

ARGUMENT

Every branch of the United States Military has a provision allowing for the free practice of religion, and requiring military leaders to balance the free practice of religion with the prohibition against government exercise of religion. For example, the Air Force's provision reads as follows:

> Leaders at all levels must balance constitutional protections for their own free exercise of religion, including individual expressions of religious beliefs, and the constitutional prohibition against governmental establishment of religion. They must ensure their words and actions cannot reasonably be construed to be officially endorsing or disapproving of, or extending preferential treatment for any faith, belief, or absence of belief.

Air Force Instruction 1-1, Sec. 2.12 (2012). However, the United States military has been plagued by a history of excluding, ostracizing, humiliating, and harassing servicemembers who do not practice the Christian faith. Many of these instances have been fueled by military leadership. Approximately 30% of servicemembers do not identify themselves as Christian, leaving nearly one-third of servicemembers vulnerable to acts of religious intolerance, and threatening the ability for our military to act as a cohesive unit.

In *Salazar v. Buono*, justices of this Court raised the issue as to whether a land transfer involving a cross-shaped military memorial would "project a message of government endorsement [of religion] to a reasonable observer." *Salazar v. Buono*, 559 U.S. 700, 744 (2010) (Stevens, J. dissenting). At the time, several military officials acting as *amici* raised the concern that the perception that the government was honoring Christian servicemembers

over those of other faiths would be impermissibly damaging:

> The message that the military values the sacrifices of Christian war dead over those of servicemembers from other faith traditions...that is not only a clear constitutional violation, but is also harmful to the military as an institution, adding to social divisiveness in the very way that the Establishment Clause is intended to avoid.

Brief of Former High-Ranking Military Officials Colonel David Antoon, Brigadier General Israel Drazin, Vice Admiral Bernard Kauderer, Colonel Richard L. Klass, Brigadier General A.A. "Tony" Verrengia, and Colonel Lawrence B. Wilkerson, *Salazar v. Buono*, 559 U.S. 700 (2010) (No 08-472) at 4.

This case raises the same concerns. The Bladensburg cross lists the names of Christian servicemen from Prince George's County and Baltimore, Maryland, and Washington, D.C. who died during World War I, but excludes the names of Jewish servicemen from the same region who similarly gave their lives for their country. Those Jewish servicemen are not honored in any other way in the region. Further, the religiously-themed dedication of the cross, and the Christian services that have taken place featuring this cross, bring into question whether the cross really serves as a secular monument that honors *all* servicemen who gave their lives.

I. THE UNITED STATES MILITARY IS A HIGHLY DIVERSE INSTITUTION, WITH SERVICEMEMBERS WHOSE RELIGIOUS DIVERSITY MIRRORS THAT OF THE UNITED STATES.

The United States military is a strikingly religiously diverse institution. In 2017, 30% of U.S. military personnel did not identify themselves as Christian. Kristy Kamarck, *Diversity, Inclusion, and Equal Opportunity in the Armed Services: Background and Issues for Congress*, CONG. R. SERVICE No. 7-5700 40-43 (2017). Because the military is such a religiously diverse organization, it is important not to show a preference for one religion over another, or to discriminate against certain religions.

The millennial generation, which constitutes the focus of the military's current recruiting and retention efforts, is the most ethnically and racially diverse cohort in the nation's history. Its diverse religious beliefs and practices may differ from those commonly understood and accepted by the military's majority culture, and it demonstrates gradually increasing tolerance of religious difference. U.S. Military Leadership Diversity Commission. (2010, June). *Religious Diversity in the U.S. Military*. [Issue Paper #2]. Arlington, VA: Military Leadership Diversity Commission, 22.

Given its young demographic, the military appears to reflect the religious diversity of the United States in terms of identification with minority faiths, identification with possessing no religious preference, and identification with groups traditionally considered outside the religious mainstream (e.g.,

Pagan, Eastern, Humanistic, and others). U.S. Military Leadership Diversity Commission. (2010, June). *Religious Diversity in the U.S. Military*. [Issue Paper #2]. Arlington, VA: Military Leadership Diversity Commission, 22. Religious diversity in the military reflects the civilian population, including the greater religious diversity of its youth. *Id.*

The United States military has played a pivotal role in the United States' pursuit of equality of opportunity for all citizens. In 1948, after the end of World War II, President Harry S. Truman issued historic Executive Order 9981. This order called for the desegregation of the military by providing "equality of treatment and opportunity for all persons in the armed services." Exec. Order No. 9981, 13 Fed. Reg. §4313 (1948). Since then, the U.S. military has become a groundbreaking institution that is dedicated to the ideal that individual servicemembers should be rewarded for their performance and dedication, no matter their gender, skin color, ethnic background, or religion. U.S. Military Leadership Diversity Commission. (2011, March). *From Representation to Inclusion: Diversity Leadership for the 21st-Century Military*. [Final Report]. Arlington, VA: Military Leadership Diversity Commission.

Today, we see the military continue to recognize its religious diversity. In 2017, the Department of Defense announced a near doubling of its list of recognized religions. *See* Memorandum from the Off. of the Assistant Secretary of Def. on Faith and Belief Codes for Reporting Personnel Data of Service Members. (Mar. 27, 2017) (changing DoDI 1336.05 "Faith Group Codes", now titled "Faith and Belief Code," from listing just over 100 religions to 221.) This

change highlights the government's intentions to respect the rights of all service personnel by recognizing the ever-growing religious diversity in the military. *Id.*

Various religious minorities have provided distinguished and honorable service. The most decorated unit in American military history was composed of 4,500 Japanese-Americans who subscribed to faiths including Buddhism and Shintoism as well as Christianity. Robert Asahina, *Just Americans: How Japanese Americans Won a War at Home and Abroad* (2007). This unit, the 100th Infantry Battalion, fought eight major campaigns during World War II and played an instrumental role in liberating the Dachau Concentration Camp. *Id.*

Muslim servicemembers have fought in every U.S. war since at least the Civil War. Dave Philipps, Muslims in the Military: The Few, the Proud, the Welcome. N.Y. TIMES (2016), https://www.nytimes.com/2016/08/03/us/muslims-us-military.html. Currently, there are an estimated 4,000 to 6,000 servicemembers in the U.S. military who identify as Muslim. *Id*; *see also* Mariam Khan, *More than 5,000 Muslims Serving in the U.S. Military, Pentagon Says*, ABC NEWS (2015), https://abcnews.go.com/US/5000-muslims-serving-us-military.

Jewish servicemembers have fought for the United States in every major conflict in history. Seymour Brody, *350 Year Commemoration of Jews in America's Military* (2004), available at http://seymourbrody.com/military/brody_military.pdf. During the Revolutionary War, many Jewish soldiers were in General George Washington's Continental

Army. *Id.* During the Civil War, six Jewish soldiers in the Union Army were recipients of the prestigious Medal of Honor. *Id.* There were more than 250,000 Jewish soldiers who fought in World War I, of whom over 3,500 were killed, 12,000 were wounded, and 1,100 received decorations for bravery. *Id.* Nearly 250,000 Jews served in the American Expeditionary Forces, which totaled 4.8 million men and women. Eighteen percent were foreign born. National World War I Museum and Memorial, *For Liberty: American Jewish Experience in WWI,* 13 Nov 2018, https://www.theworldwar.org/explore/exhibitions/past-exhibitions/liberty-american-jewish-experience-wwi.

However, despite the strides that the military has taken in recent years to become more inclusive, non-Christian servicemembers have been, and continue to be, subject to religiously-fueled discrimination and humiliation. Such actions devalue the contributions of non-Christian servicemembers and disintegrate the unity that the military needs to achieve in order to carry out its duties.

II. RELIGIOUSLY-FUELED TENSION HAS LONG PLAGUED U.S. MILITARY BRANCHES, OSTRACIZING MEN AND WOMEN WHO DO NOT IDENTIFY AS CHRISTIAN.

Despite the Department of Defense's position discussed above, the United States military has long suffered from religious tension, discrimination, and harassment that has impacted numerous servicemembers who did not share those religious views.

In 2012, a cadet at the United States Military Academy West Point, Blake Page, publicly withdrew from the academy due to the "overt evangelism" that permeated campus. In a letter he wrote, Page said that he did not "wish to be in any way associated with an institution which willfully disregards the Constitution of the United States by enforcing policies which run counter to the same." Anna Mulrine, *Too Much Religion at Military Academies? West Point Cadet Revives Charge*, CHRISTIAN SCIENCE MONITOR (Dec. 7, 2012), https://www.csmonitor.com/USA/Military/2012/1207/Too-much-religion-at-military-academies-West-Point-cadet-revives-charge. Those policies included prayers at mandatory events and regular religious events that made non-Christian students feel ostracized. Most shockingly, Page also experienced individual instances of harassment at West Point for not sharing his classmates' evangelical religious views. *Id.*

Page is not the only cadet to experience discrimination because of his views, nor is West Point the only military institution to play host to religious discrimination. At the Air Force Academy, cadets who chose not to go to chapel after dinners would be marched to their dormitories in a "Heathen Flight," forcing Air Force leadership to create a "task force" to evaluate whether "faculty and staff have pressured cadets into converting to evangelical Christianity." Alan Cooperman, *Air Force to Probe Religious Climate at Colorado Academy*, Washington Post, May 4, 2005), http://www.washingtonpost.com/wp-dyn/content/article/2005/05/03/AR2005050301499.html.

Despite their longstanding history of military service, Muslim servicemembers shared that they had encountered "knuckleheaded comments equating them with terrorists." In the months leading up to the 2016 election, Khizr and Ghazala Khan, the parents of Army Captain Humayun Khan, who was killed in Iraq in 2004, were subject to an endless stream of disparaging comments. Dave Philipps, Muslims in the Military: The Few, the Proud, the Welcome. N.Y. TIMES (2016), http://www.nytimes.com/2016/08/03/us/muslims-us-military.html.

Some of this discrimination has even been perpetuated by military religious leadership. Captain Sonny Hernandez, an Air Force Reserve chaplain, wrote an article in which he explained his view that only Christians should be able to serve as military chaplains. He wrote, "Christian service members who openly profess and support the rights of Muslims, Buddhists, and all other anti-Christian worldviews to practice their religions—because the language in the Constitution permits it—are grossly in error, and deceived." Sonny Hernandez, *Christian Service Members: Avoid supporting or Accommodating Evil!*, BarbWire, (Sept. 12, 2017), https://barbwire.com/christian-service-members-avoid-supporting-accommodating-evil/. Captain Hernandez continued with statements such as, "[I]s it wrong for a professing Christian service member to say, 'I support the rights of all Americans to practice their faith since the Constitution protects their rights?' Absolutely!" *Id.*

For twenty years, chaplains at the Vandenburg Air Force Base in California taught a mandatory course titled "Christian Just War Theory," which subjected servicemembers to Biblical justifications for

atomic warfare, should such drastic actions be needed in the future. Jacqueline Zoller, *Who Cares If Jesus Loves Nukes?: The Constitutionality of the Christian Just War Theory Taught to the Air Force Missile Launch Officers*, 14 RUTGERS J. L. RELIGION 425, 449 (2012). Among other lessons, the course featured a PowerPoint presentation with several passages from the Old Testament and the New Testament. *Id.* at 430-432. This course was discontinued only after thirty-one nuclear missile launch officers complained to Air Force officials that the course was inappropriate. *Id.* A memorandum sent to Air Force officials warned that proselytizing could lead to the "degradation of the unit's morale, good order, and discipline" if only certain religions were emphasized. *Id.* at 433.

Another Air Force chaplain, Major Warren Watties told cadets that if they were not "born again" they would "burn in the fires of hell." Drew Miller, *Inside the Military's Campaign to Make Its Soldiers Christian,* MIC, (Sept. 4 2013), https://mic.com/articles/61629/inside-the-military-s-campaign-to-make-its-soldiers-christian#.TGqhO4iWy.

Non-Christian members of the military have had to face discrimination by their peers and superiors. Specialist Jeremy Hall founded a chapter of the Military Association of Atheists and Freethinkers at Camp Speicher in Tikrit, Iraq. Neela Banerjee, *Soldier Sues Army, Saying His Atheism Led to Threats,* N.Y. TIMES (April 26, 2008), https://www.nytimes.com/2008/04/26/us/26atheist.html. In July 2007, a major came to the meeting, during which he told the soldiers there that "people like you are not holding up the Constitution and are going against what the founding

fathers, who were Christians, wanted for America." *Id.* After this incident, Specialist Hall said he did not trust his officers. Eventually, after threats from other soldiers, the military sent him home early. *Id.* However, once he returned to base in the United States, Specialist Hall continued to experience discrimination for his beliefs. *Id.*

Not all instances of preferential treatment towards Christianity have been explicit – certain actions are more subtle, but still as damaging. In Iraq and Afghanistan, members of the U.S. Military used rifle sights made by Trijicon with inscriptions on them referring to Bible verses, transforming their weapons into what became known among the troops as "Jesus rifles." Joseph Rhee, Tahman Bradley, & Brian Ross, U.S. Military Weapons Inscribed with Secret 'Jesus' Bible Codes, ABC News (Jan. 18, 2010), https://abcnews.go.com/Blotter/us-military-weapons-inscribed-secret-jesus-bible-codes/story?id=9575794. These inscriptions read "2COR4:6" referring to Second Corinthians 4:6: "For God, who commanded the light to shine out of darkness, hath shines in our hearts, to give the light of the knowledge of the glory of God in the face of Jesus Christ." *Id.*

Against this background of the military's struggles to respect the religious diversity of its members, the Bladensburg Cross stands out as a government imprimatur on religious exclusion, emboldening the leaders and members who would engage in acts such as those described above, and leading to further division amongst our nation's military.

III. THE BLADENSBURG CROSS'S RELIGIOUS HISTORY AND EXCLUSION OF JEWISH SERVICEMEN SERVES TO MEMORIALIZE RELIGIOUS PREFERENCE, AND LEADS TO THE PERCEPTION THAT OUR GOVERNMENT ENDORSES SUCH EXCLUSION.

The history of the Bladensburg Cross shows that it stands to commemorate Christian servicemen from Prince George's County and the surrounding area, while excluding Jewish servicemen who – like their Christian counterparts – made the ultimate sacrifice for their country during World War I. That the memorial is shaped like a cross is not the extent of the issue in this case. The Bladensburg Cross stands as a memorial to religious-based exclusion, as the cross excludes Jewish servicemen from the greater Washington and Baltimore area. That this cross stands on public land carries with it the impermissible and dangerous perception that a state government condones religious preference and endorses religious-based exclusion.

This Court has previously stated that memorials constitute a significant means of communication from the government to the general public. "Governments have long used monuments to speak to the public... .Triumphal arches, columns, and other monuments have been built to commemorate military victories and sacrifices and other events of civic importance." *Pleasant Grove City v. Summum*, 129 S. Ct. 1125, 1132-33 (2009) (discussing that the purpose of monuments is typically "to convey some

thought or instill some feeling in those who see the structure").

The memorial, formally labeled as the Peace Memorial, is a forty-foot concrete cross in the town of Bladensburg in Prince George's County, Maryland. The cross was erected at the junction of the National Defense Highway and Washington-Baltimore Boulevard, the road from Baltimore to Washington that would have been travelled by families, friends, and comrades of the dozens of Jewish servicemen from the nearby Baltimore area who lost their lives in the war. From 1919 to 1925, the cross was constructed with the purpose of honoring men from the area who perished in World War I. *Peace Cross*, Maryland's Nat'l Register Props., https://mht.maryland.gov/nr/NRDetail.aspx?NRID=1644 (last visited January 14, 2019). In total, forty-nine men are listed on the cross with an inscription above their names that reads: "This memorial cross is dedicated to the heroes of Prince George's County, Maryland who lost their lives in the Great War for the liberty of the world." According to their draft registration cards and other sources, nearly a third of these forty-nine names were actually from towns outside of Prince George's County, and even other states outside of Maryland, with some not having even the slightest connection to the county. This includes a number of Christian veterans from the greater Baltimore area, a city that has historically been home to a vibrant Jewish community. Draft registration cards (copies on file with fold.3com Military Records).

In 1925, during the dedication ceremony of the monument which was attended by both governmental officials and members of the Christian clergy, the

keynote speaker of the event, Maryland Representative Stephen Gambrill, proclaimed, "By the token of this cross, symbolic of Mount Cavalry, let us keep fresh the memory of our boys who died for our righteous cause." Joint Appendix at 55a-56a.

At the time the cross was built, local news sources described the memorial as "a mammoth cross, the likeness of Mount Calvary on which Christ died, will be built to perpetuate the memory of the heroes who died to save the country. ... Many towns and counties throughout the United States have selected the Calvary Cross as the most appropriate monument." *Calvary Cross To Honor Dead*, WASHINGTON HERALD, May 25, 1919, at 16.

Christian chaplains provided sermons and speeches at the cross's dedication ceremony, including Rev. F.C. Reynolds, who served as chaplain in the 115th Infantry unit, and Rev. A.J. Carey, who was the pastor of St. Jerome's Catholic Church in Hyattsville (Prince George's County). *War Dead Honored by Prince Georges*, WASHINGTON POST, May 3, 1929, at 3.

It is significant that no representatives of other minority religions or cultures were present to offer dedications at the ceremony. *Am. Humanist Ass'n v. Maryland-Nat'l Capital Park & Planning Comm'n*, 874 F.3d 195, 200-01 (4th Cir. 2017).

News sources at the time the cross was erected were clear in their description of the cross as a religious monument. When raising funds for the cross, school-children were asked to make the following pledge:

> We, the school children of Maryland, trusting in God, the supreme ruler of the universe, pledge faith in our brothers

> who gave their all in the world war to make the world safe for democracy. Their mortal bodies have turned to dust, but their spirit lives to guide us through life in the way of Godliness, justice and liberty. With our motto, 'One God, One country and One flag,' we contribute to this memorial cross commemorating the memory of those who have not died in vain.

Prince Georges Plans War Memorial Cross. EVENING STAR, Washington, D.C., June 2, 1919, at 21.

Therefore, these sources from the time the cross was erected show that this cross was not intended to be a secular memorial commemorating all soldiers from the region. The cross is clearly intended to be a Christian memorial, for Christian soldiers, dedicated in a ceremony that was attended by government officials, and standing on government land.

Furthermore, the forty-nine names listed on the memorial exclude the names of Jewish servicemen from the region who gave their lives during World War I. Some of the Jewish servicemen served in the same regiment as the men whose names are listed on the cross.

Sgt. Isaac "Ike" Morris, a Jewish serviceman, was killed in action in France and later eulogized in the *Baltimore Sun* by his friend Ben Blumenthal, yet his name is missing from the forty-nine listed on the cross. In a letter to the *Sun's* editor, Blumenthal stated that Sgt. Morris was "brave to the core, intensely patriotic, and a sincere and loyal friend of humanity, it became his great privilege to put his heart and soul in America's call for men to make the

world a better place to live." Ben Blumenthal, *Sergt. Isaac Morris.*, BALTIMORE SUN, December 11, 1918, at 6.

Lieutenant Merrill Rosenfeld, a Baltimore native who served in the same regiment as many of the names memorialized on the cross, was killed in October 1918 in France while leading a group of men in a charge against an enemy machine gun nest. Although he was awarded the Distinguished Service Medal for his heroic actions during World War I, his name was left off the cross. *See Saw Lt. Rosenfeld's Body*, BALTIMORE SUN, Nov. 25, 1918, at 12.

Another absent name is that of PFC Zadoc Morton Katz, a Baltimore native who was shot and killed after leading reinforcements into battle at Montfaucon. In a letter, PFC Katz wrote about how the Jewish servicemen celebrated Rosh Hashanah without any provisions or services from the military:

> I don't think any of the 250 Jewish boys assembled in the "Y" hut last Saturday morning to celebrate 'Rosh Hashona' could have been more profoundly moved than I. With no one to officiate but the boys themselves, and no complete prayer book of the service, the orthodox service was chanted through.... The services concluded about 11 A. M. with the singing of 'America', and I reported to my platoon for duty, feeling a pride in my co-religionists and a surety that after the war the epithet 'Coward' cannot be hurled at us.

Michael Rugel, *Over There: Zac Morton Katz*, National Museum of American Jewish Military History,

https://nmajmh.org/2017/06/over-there-zadoc-morton-katz/ (Jun 28, 2017).

Private Louis Balser, who served in Company D of the 115th Infantry – the same regiment whose chaplain presided over the dedication ceremony at the cross – died in October 1918 in France. Information about his service comes from letters his brother published in local newspapers, seeking information about Pvt. Balser's whereabouts. Although many of his Christian comrades from the 115th Infantry unit were honored on the cross, his name was left off. *Seeks Word of Private Balser*, BALTIMORE SUN, Dec. 21, 1919, at 16.

The fact that some of these unlisted veterans were not originally from Prince George's County is of no import because many of the forty-nine men named on the cross were also from Baltimore and other communities in Maryland. *See* Draft registration cards (copies on file with fold3.com Military Records). Given that the names of these veterans were not honored on the monument despite their acts of courage and selfless leads to the conclusion that such an honor was conferred prescriptively to Christians rather than uniformly to all the men who lost their lives.

The history of the Bladensburg cross clearly shows that the memorial was intended only for Christian servicemen, and conspicuously excluded Jewish servicemen, many of whom served alongside those who were included among the forty-nine men listed on the cross. If this memorial is permitted to stand on government land, it will stand not as a monument for all veterans, as the petitioners argue it

does in modern day, but as a monument of government-sponsored religious exclusion.

CONCLUSION

The United States military is religiously diverse, and servicemembers of all religious backgrounds have honorably and valiantly served this country – some making the ultimate sacrifice. Military memorials, particularly those standing on public land, should honor and celebrate this diversity by not showing a preference of one religion over another.

To be effective, the military must be able to respond to dangerous situations as a singular unit. Instances of discrimination, religious favoritism, and any actions that cause a significant percentage of the military's members to feel excluded chip away at this cohesiveness and, in turn, make the military less effective and its members disconnected.

Amici respectfully ask this Court to affirm the district of the Fourth Circuit.

Respectfully Submitted,

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APPENDIX I

List of Amici

Michael "Mikey" Weinstein, Esq.

Mikey Weinstein is the Founder and the President of the Military Religious Freedom Foundation. Weinstein is a 1977 Honor Graduate of the United States Air Force Academy. Mikey served as the first General Counsel to Texas billionaire and two-time Presidential candidate H. Ross Perot and Perot Systems Corporation. A registered Republican, he also spent over three years working in, and for, the West Wing of the Reagan Administration as legal counsel in the White House. In his final position there, Mikey was named the Committee Management Officer of the much-publicized Iran-Contra Investigation in his capacity as Assistant General Counsel of The White House Office of Administration, Executive Office of the President of the United States.

Robert Muller

Nobel Peace Prize, Co-Founder, International Campaign to Ban Landmines, (1997); MRFF Advisory Board Member

Robert Muller, a MRFF Advisory Board Member, served as a Marine Infantry Officer in Vietnam in 1968-69. While leading an assault on an enemy-held hill, he was shot through the chest, leaving him permanently paralyzed from the chest down. Upon returning to the States, he spent a year in a VA hospital in New York City. His ward was the basis of a cover story in *Life* magazine that shocked

Americans when the horrible conditions of the treatment and facilities were revealed. It was the second largest selling issue *Life* magazine ever published and triggered a national scandal concerning the treatment that at least some veterans had to endure. There were congressional hearings and a lot of national media coverage. Muller was the spokesman for the veterans. He later started a veteran's advocacy group, Vietnam Veterans of America (VVA) and led the organization for nine years. The group was granted a congressional charter in 1986 and remains the only national organization for Vietnam veterans.

He also led the first group of veterans to return to Vietnam in 1981 to begin a process of normalizing relations between Vietnam and the USA. He worked cooperatively with Vietnam on issues of mutual concern from the war including: Agent Orange and its health effects on those who served; a better accounting of those listed as missing from the war; the issue of American children; and how to assist in recovery from the war. His continuing efforts over the years led to millions of dollars being contributed by the US government to help clean up hot spots of Agent Orange, assistance in clearance of unexploded ordnance and landmines, as well as broader rehabilitation programs for civilian war victims.

After stepping down as president of VVA, he continued working with a companion organization he has also set up called Vietnam Veterans of America Foundation that focused on humanitarian programs principally targeting civilian casualties. The organization wound up establishing rehabilitation programs in Vietnam, Cambodia and numerous other

war-torn countries around the world. The organization's efforts initially focused on landmine victims since Cambodia had the highest number of amputees per capita in the world. Gaining a better understanding of how pervasive and damaging landmines have been, he co-founded an international campaign to ban the weapon. His organization managed the campaign and the International Campaign to Ban Landmines was awarded the Nobel Peace Prize in 1997.

Several years later. Muller changed the name of the organization to Veterans For America to be inclusive of service members and veterans of our wars in Afghanistan and Iraq. Veterans for America was the leading voice for several years in calling attention to the plight of this younger group who endured multiple deployments, extensions of deployments and the reduction of time between deployments which eventually led to a Blue Ribbon DOD Commission that recognized these policies as knowingly compounding injuries to those who serve. Veterans For America conducted base visits to highlight the many problems returning service members were confronted with and helped promote the national scandal that focused on poor treatment at Walter Reed hospital in the nation's capital.

Richard C. Harding

Lieutenant General, United States Air Force (ret.)

Lt. Gen. Richard C. Harding (USAF, retired) was nominated in 2009 by the President, confirmed in 2010 by the United States Senate, and served as the 16th Judge Advocate General (TJAG) of the United States Air Force. In that capacity and until his

retirement in 2014 at the expiration of his statutory tour, General Harding served as the legal adviser to the Secretary of the Air Force and all officers and agencies of the Department of the Air Force. He directed all Air Force attorneys in the performance of their duties and was responsible for the professional oversight of more than 2,200 judge advocates, 350 civilian attorneys, 1,400 enlisted paralegals and 500 civilians in the Air Force Judge Advocate General's Corps worldwide. While serving as the Air Force TJAG, General Harding also served as Senator (R/SC)/Colonel Lindsey Graham's Air Force supervisor.

General Harding was the principal architect and drafter of Air Force Instruction 1-1, entitled "Air Force Standards," which remains in effect today and which includes an instruction on "Government Neutrality Regarding Religion." He also created the Department of Defense's Special Victim Counsel (SVC) program, which provides legal services to military survivors of sexual assault. The SVC program was recognized by a Department of Justice award, enacted into law by Congress, and has reduced sexual assault in the Department of Defense.

General Harding, the son of an Air Force officer and grandson of a Naval officer, entered the Air Force with a direct commission in 1980. Following his commissioning, he served in a variety of assignments as a judge advocate to include serving six assignments as a staff judge advocate at the unified command, major command, numbered air force and wing levels. Prior to assuming his position as The Judge Advocate General, he served as the Commander, Air Force Legal Operations Agency, Bolling Air Force Base, D.C.

General Harding received a Bachelor of Science degree from the University of Arkansas in 1975 and a law degree also from the University of Arkansas in 1979. General Harding is a graduate of the Air Force Squadron Officer School, Air Command and Staff College, and Air War College.

His assignments in chronological order include: Bitburg Air Base, West Germany; deputy Staff Judge Advocate at Dyess AFB, Texas; Chief, Executive Services Division, Office of The Judge Advocate General, Headquarters U.S. Air Force, the Pentagon, Washington, D.C; Chief of the Special Law Branch and Chief of the Information and Privacy Law Branch, General Law Division, Headquarters U.S. Air Force, the Pentagon, Washington, D.C.; Chief of Officer Assignments, Judge Advocate General Professional Development Division, Headquarters U.S. Air Force, the Pentagon, Washington, D.C.; Staff Judge Advocate, Randolph AFB, Texas; Staff Judge Advocate, Elmendorf AFB, Alaska; Deputy Chief Counsel, U.S. Transportation Command, Scott AFB, Ill.; Staff Judge Advocate, U.S. Strategic Command, Offutt AFB, Neb.; Staff Judge Advocate, Headquarters 8th Air Force, Barksdale AFB, La.; Staff Judge Advocate, Headquarters Air Force Space Command, Peterson AFB, Colo.; Staff Judge Advocate, Headquarters Air Combat Command, Langley AFB, Va.; Commander, Air Force Legal Operations Agency, Bolling AFB, D.C., and The Judge Advocate General, Headquarters U.S. Air Force, the Pentagon, Washington, D.C.

General Harding's decorations include: two Distinguished Service Medals, two Defense Superior

Service medals, two Legion of Merit Medals, and six Meritorious Service awards.

William T. "Bill" Lord
Lieutenant General, United States Air Force (ret.)

General Lord was the USAF Chief Information Officer and Chief of War Fighting Integration from 2009 until his retirement in 2012. He was responsible for 30,000 personnel providing information technology services for the entire USAF with a budget of $8 billion. Prior to that, he was the Commander of the USAF Cyber Command (provisional) establishing cyberspace as a USAF operating domain. He has been a commander six times and at every organizational level in the USAF. He was named the best USAF Wing commander year for the leadership of his 16,000 personnel at Keesler Air Force Base, Biloxi, MS, through Hurricane Katrina. A graduate of the US Air Force Academy, Chapman University, and the Industrial College of the Armed Forces he holds a Bachelor of Science, Master of Business Administration, and Master of Science in National Resource Strategy (Telecommunications). His assignments included tours of duty in Europe and the White House. General Lord has lectured by invitation at UC Berkley, Stanford, Harvard Law, Princeton, Temple, Univ. of PA, Univ. of North Carolina, AF Academy, US Military Academy West Point, Dartmouth Univ., Louisiana State Univ., Norwich Univ., and the Nat'l War College. He is the recipient of over 20 industry awards for his leadership in the information technology area. He is currently a cyber and information technology system and services consultant.

Irving "Irv" Halter

Major General, United States Air Force (ret.)

Maj. Gen. (Ret.) Irving Halter is a veteran of over 32 years in the United States Air Force. Irv graduated from the Air Force Academy in 1977, and his career took him around the globe with over 14 years of overseas assignments, culminating in senior positions at the Academy, the National Reconnaissance Office, and Joint Staff in Washington, DC. His final assignment was Vice Director for Operations, J3, where he advised and facilitated global operations for the Chairman, Joint Chiefs of Staff, Secretary of Defense, and other senior DoD and national security leaders.

During his Air Force career, Irv commanded five different operational units including a fighter squadron, operations group, two fighter wings, and a numbered air force. In his final command, 19th Air Force, Irv was responsible for all basic and advanced Air Force flying training, directing 30,000 professionals at 18 bases across the United States while executing 500,000 flying hours a year. He also served as the senior Air Force officer in Afghanistan during early combat operations in 2002. Irv was a highly-experienced fighter pilot, flying over 3200 hours in jet aircraft, including 180 combat hours over Iraq and Afghanistan.

John Compere

Judge, Brigadier General, United States Army (ret.); MRFF Advisory Board Member

Brigadier General John Compere, Judge Advocate General's Corps, US Army (Retired) graduated from Texas Tech University (B.A.,

Government) and the University of Texas (J.D., Law). Army ROTC commissioned, he volunteered and entered active duty in January 1967 as a 101st Airborne Division paratrooper and prosecutor, served in CONUS, Thailand, Vietnam, Honduras, and Panama, and retired as a Disabled American Veteran (Vietnam). He is the former Chief Judge of the US Army Court of Military Review (a tenured US judicial position nominated by President George H.W. Bush and confirmed by Congress). Compere was also the owner of a San Antonio law firm and a board-certified civil trial lawyer, mediator, and arbitrator in federal and state courts. As an author and lecturer for the State Bar of Texas, 74 of his legal articles were copyrighted and published. In January 2007, he retired and returned to the family ranch in Texas with his wife Dolores.

Martin France

Brigadier General, United States Air Force (ret.); MRFF Advisory Board Member

Brigadier General Martin E.B. France (USAF retired) is a graduate of the United States Air Force Academy (B.S.), Stanford University (M.S.) and Virginia Tech (Ph.D.), as well as a distinguished graduate of the National War College. His 41-year Air Force career culminated in 13 years of service as the Permanent Professor and Department Head of for Astronautics at the US Air Force Academy, including a term as the Chief of the Engineering Division (civilian College of Engineering Dean equivalent). His professional experience includes research and development assignments with the Air Force Research Lab working on high energy laser systems, as the Air

Force Exchange Engineer to France, assigned to Toulouse, France, and as a program manager at the Defense Advanced Research Projects Agency (DARPA). He served as the Chief Scientist of the Joint Improvised Explosive Device Defeat Organization (JIEDDO) and earlier as an instructor, associate professor, and executive officer in the Department of Astronautics, USAF Academy. General France also served as a staff officer at Air Force Space Command, the Air Staff, and on the Joint Chiefs of Staff, writing long-range mission area plans for space forces, in a variety of requirements positions for space support, force enhancement, space superiority, intelligence, and special access programs, and in key support roles within the Pentagon during Operations NOBLE EAGLE and ENDURING FREEDOM. He was awarded a Fulbright Fellowship in 2014 and served as a visiting scholar to Nanyang Technological University (Singapore) during the fall of that year. In 2017, he was invited to serve on the foundational cadre of the President's National Space Council. He has published technical, policy, and strategy papers in several refereed journals, and was a fully qualified Foreign Area Officer (fluent in French), a Joint Specialty Officer, and a Level III Certified Acquisition Professional. His awards include the Legion of Merit, Joint Meritorious Service Medal, the Meritorious Service Medal with five oak leave clusters and the Military Religious Freedom Foundation's Jefferson Award. He lives with his wife of 37-plus years, Becky, in Colorado Springs and is currently a senior technical analyst with Integrity Applications, Inc.

Andrew E. Salas
Brigadier General, United States Air Force

Brigadier General Andrew E. Salas is the Special Assistant to the Chief, National Guard Bureau, Diversity and Inclusion. His role is to ensure that America's rich diversity is reflected and welcomed in the National Guard's ranks. He has served as New Mexico's Adjutant General, in command of the 332nd Expeditionary Support Group In Operation Iraqi Freedom, as Vice Wing Commander for the 150th Special Operations Wing, and with the Executive Office of the President, Drug Control Policy. He also served at Headquarters, United States Air Force as Director of Ground Safety and as the Air National Guard liaison to 12th Air Force (AF Southern).

Vincent R. Lindenmeyer
Colonel, Ph.D., United States Army (ret.)

Colonel Vincent Ray Lindenmeyer, Ph.D., USA, Retired is a veteran of Operation IRAQI FREEDOM and Operation ENDURING FREEDOM with overseas assignments to Korea, Qatar, Egypt, and Iraq.

Colonel Lindenmeyer culminated his 26-year active duty career as a Battle Watch Commander for the United States Strategic Command (USSTRATCOM) overseeing the country's most sensitive missions across the nuclear, space and cyber domains. He is also an expert in collaborative operations and future operations planning teams, having served in the J3, USSTRATCOM. During his service in Iraq, Colonel Lindenmeyer served as the Senior Strategist, Advisor, and Lead, Professional Military Education, Office of Security Cooperation—

Iraq, Baghdad. He moved the Iraq National Defense University and Iraq War College to a US-funded $14M new campus in the International Zone, created a strategic framework for curriculum development, and planned and organized a first-ever Iraq National Security Conference, JUN12, receiving the Bronze Star Medal.

Highlights of Colonel Lindenmeyer's career include commanding a company in the 82d Airborne Division, Ft. Bragg, North Carolina, (1998-2000); serving as Executive Officer for the 1st Support Battalion, Multinational Force & Observers (MFO), Sinai, Egypt, (2004-2005), commanding the Combat Support Coordination Team in Korea (1996-1997); and serving as a Tactical Officer at the United States Corps of Cadets, United States Military (2000-2004).

Colonel Lindenmeyer is a graduate of the US Army Ranger School, US Army Airborne School, US Army Jumpmaster School (with 45 Airborne jumps), and earned the Expert Infantryman's Badge and Senior Parachutists Badge. Colonel Lindenmeyer awards include the Bronze Star Medal, Defense Meritorious Service Medal, Meritorious Service Medal with Silver oak leaf cluster, Joint Service Commendation, Army Commendation Medal with two Bronze oak leaf clusters, Army Achievement Medal, National Defense Service Medal with Bronze Star, Iraq Campaign Medal, Global War on Terrorism Expeditionary Medal, Global War on Terrorism Service Medal, Korea Defense Service Medal, Outstanding Volunteer Service Medal, Army Service Ribbon, Army Overseas Service Ribbon with Numeral 2, and the Multi-national Force and Observers Medal Ribbon with Numeral 2.

Colonel Lindenmeyer's civilian education includes a Ph.D. in Education, Northcentral University, Prescott, Arizona, 2013; Master of Strategic Studies, United States Army War College, 2011; Master of Science in Education, Long Island University, CW Post, 2001; Master of Science in Management, University of Central Texas, 1995; Bachelor of Science, United States Military Academy, 1991; and Certificate of Completion, United States Military Academy Preparatory School, 1987. From his initial oath to his retirement from active duty, Colonel Lindenmeyer served a total of 30 years to support and defend the Constitution of the United States of America.

Colonel Lindenmeyer is married to the Reverend (Doctor) Cynthia Ramirez Lindenmeyer and ordained minister in the United Church of Christ. Colonel Lindenmeyer and Reverend (Doctor) Lindenmeyer stand together as fierce advocates for the disenfranchised, underrepresented, and those without a voice, today and always.

Richard L. Klass
Colonel, United States Air Force (ret.)

Colonel Richard L. Klass (USAF retired) is a distinguished graduate of the United States Air Force Academy and the National War College. He received an M.A. (First Class) and MLitt degrees from Oxford University, attending as a Rhodes Scholar. He also served for two years in the Executive Office of the President as a White House Fellow.

His military assignments include over 200 combat missions as a Forward Air Controller in Southeast Asia, teaching at the Air Force Academy,

and tours in Germany and the Pentagon. His awards include the Silver Star, Distinguished Flying Cross, Legion of Merit and Purple Heart. He lives with his wife, Liz, in Arlington, Virginia.

Quentin D. Collins
Colonel, United States Air Force (ret.); MRFF Advisory Board Member

Quentin D. Collins, a MRFF Advisory Board Member, enlisted in the US Air Force on February 6, 1976. After serving one four-year stint, he went on to college and upon graduation enlisted in the US Army and was selected for Officers Basic Course for commissioning. He became a Company Commander in the 1st Infantry Division as well as completing US Army's Ranger Qualification Course and Sniper School. Upon separation, he went on and received Master's Degrees in Religion, Divinity and Information Systems.

As a member of an Evangelical, Non-Denominational Church he was feeling compelled to become a Chaplain in the US Military. This was fulfilled when he was appointed as an Air Force Chaplain in February 2000. In September 2001, he was activated from his position in the Air Force National Guard to support both Operation Enduring Freedom and Operation Iraqi Freedom. Having been wounded in Action in December 2004 he was awarded both a Purple Heart and a Bronze Star with Combat V for actions taken in the Mosul, Iraq Suicide Bombing at the dining facility. Following 16 months of rehabilitation, he became a US Army Chaplain and deployed for his fourth and final combat deployment in 2007 to Iraq. Being an Engineer Brigades

Chaplain, he traveled extensively to eleven provinces of the 18 in Iraq. He drove over an Improvised Explosive Device while driving in Al Baquoba, Iraq on April 8, 2008. Though the injuries seemed minimal, he was awarded another Purple Heart and a Bronze Star for helping make the "Surge" winnable.

When he returned to the United States, the injuries eventually ended his 33 years of service with a Medical Retirement on November 13, 2015. Prior to his retirement he tirelessly trained junior Chaplains of the importance of interpretation of the 1st Amendment clause of the Freedom of a Religion includes all faiths or non-faith of the Service Members they were serving. He created the Joining Community Forces Initiative which became the Joining Forces Program under the Obama Administration. He is sought out as a Subject Matter Expert on issues of Freedom of Religion and Reintegration issues for Military Veterans, Active Duty, and Their Families. He tirelessly continues this effort in his role of Founder and Director of the FRAME Initiative.

Lawrence "Larry" Wilkerson

Colonel, United States Army (ret.); MRFF Advisory Board Member

Lawrence Wilkerson, a MRFF Advisory Board Member, served 31 years in the US Army. His last military assignments were as Special Assistant to General Colin L. Powell, chairman of the Joint Chiefs of Staff (1989-1993) and as Deputy Director and Director of the U.S. Marine Corps War College (1993-1997). Upon retirement, Wilkerson served as a private consultant to General Powell (1997-2000) and then, when Powell became secretary of state, he served first

on his departmental policy planning staff (2001-2002) and then as his chief of staff (2002-2005). After departing the Department of State, Wilkerson joined the faculties of the George Washington University and the College of William & Mary. Today, he still teaches national security affairs at William & Mary as well as writes and speaks extensively across the country and the world.

Joel Schwartzman
Colonel, United States Air Force (ret.)

Rabbi Joel Schwartzman entered the United States Air Force as a member of the first Chaplain Candidate Program, Class 73B, in 1975. During the course of his military career, he was stationed in Biloxi, MS; San Antonio, TX; Newport News, VA; and Denver, CO. He served two tours overseas at both Ramstein AB, Germany, and at Hellenikon AB in Athens, Greece. He also served a tour as a Jewish Chaplain at the United States Air Force Academy in Colorado Springs, CO. There, he renovated the Jewish chapel in the iconic and renowned Cadet chapel. He commissioned and installed nine paintings in that chapel that are now worth over a million dollars. He led the Professional Division as he helped create the Command Chaplain's function at the newly formed Air Combat command. He was director of the Chaplain Individual Reserve Program at Air Reserve Personnel Headquarters, and was Senior Chaplain at the 11th Wing, Bolling Air Force Base in Washington, DC.

His military awards and decorations include the Legion of Merit, Meritorious Service Medal, Humanitarian Service Medal, Air Force Commendation Medal, Outstanding Unit Citation, Air

Force Organizational Excellence Medal, and Air Force Overseas Long Tour of Duty, and the Air Force Longevity Service Award.

He is a graduate of the Air Command and Staff College and the Air War College. In 1995, he was selected as Chaplain of the Year by the Association of Jewish Chaplains. In 1997, he had the honor of giving the Memorial Day Invocation and Benediction at Arlington Cemetery before the American people and the President of the United States. More recently, as a civilian rabbi, he invoked at President Obama's signing of the Recovery Act bill in Denver, CO.

After more than twenty-three years of military service, he retired at the rank of Colonel in September 1998.

David Antoon

Colonel, United States Air Force (ret.)

Colonel David Antoon obtained degrees from the US Air Force Academy (BS), Air Force Institute of Technology (MS), and Trinity University (MBA), and is a graduate of the Air War College. He served 29 years in the US Air Force including two tours in Vietnam as a C-130 Instructor Pilot, Flight Test Squadron Operations Officer, Test Wing Chief Of Standardization/Evaluation, and Deputy Director of the Test Wing Aircraft Modification Center. His awards include the Distinguished Flying Cross and Legion of Merit. Following his military career, Colonel Antoon was a United Airlines pilot for 20 years. He has since served as a Patient Safety Advocate with Consumer Reports and Healthwatch USA.

Gregory J. Petrequin
Colonel, United States Air Force (ret.)

Gregory J. Petrequin is a retired Colonel and Master Navigator, from the United States Air Force.

During his twenty-seven years on active duty, he served in a variety of positions, including KC-135 navigator, KC-135 instructor navigator, Combat Crew Training School Instructor Navigator, Theater Airlift Liaison Officer, Aide de Camp (to an Army 4-Star General), Squadron Operations Officer, Squadron Commander, Deputy Program Manager, Group Commander and Division Chief, as well as in numerous other staff positions.

Colonel Petrequin flew 34 sorties (in 42 days), in the KC-135A during Operation DESERT STORM, and led a 7-man airfield opening team, into Iraq, on the first night of Operation IRAQI FREEDOM, assessing and then opening Tallil Airfield and Baghdad International Airport, for U.S. and Coalition operations. He also commanded a combat search and rescue group, during Operation ENDURING FREEDOM, in the Horn of Africa, where his group conducted the first combat rescue and first civilian sea rescue, in the history of the group.

Colonel Petrequin earned his Bachelor of Arts Degree, with honors, from San Francisco State University and has completed three Master's Degrees, in Aeronautical Science, Military Operational Art, and Science and Strategic Studies, from Embry-Riddle Aeronautical University and Air University.

Colonel Petrequin was awarded the Defense Superior Service Medal, the Legion of Merit, the Bronze Star, the Meritorious Service Medal, the Air Medal, Joint Service Commendation and Achievement

medals and the Air Force Commendation and Achievement medals, as well as other campaign medals and ribbons.

Upon retirement from the Air Force, Colonel Petrequin served as a Production Manager for Cintas Corporation, managing a 68,000 square foot, multi-shift, industrial laundry plant, and two branch locations. He led a team of 50 production partners, including four supervisors, who processed over 88,000 rental uniforms and thousands of pounds of bulk product per week. He was the Cintas Midwest Group's Plant Manager of the year for 2012-2013.

Colonel Petrequin and his fiancée, an emergency room registered nurse, now make their home on a family farm in central California, where he is retired and starting a small business as well as serving as an advocate and volunteer writer and speaker for the Military Religious Freedom Foundation.

Cynthia R. Lindenmeyer

Reverend, Dr., Chaplain, American Public University System (ret.), commissioned as a U.S. Army officer

Reverend Doctor Chaplain Cynthia Ramirez Lindenmeyer is an ordained minister in the United Church of Christ currently serving as the American Public University System (APUS) Chaplain and Pastor at First United Methodist Church in Omaha, Nebraska. Her doctoral thesis from Princeton Theological University focused on social online dynamics for soldiers deployed supporting the Global War on Terror.

Commissioned into the Signal Corps, she served on active duty for seven years following graduation

from the United States Military Academy in 1990 with a B.S. in Electrical Engineering and area of study in Middle Eastern History. Throughout her military career, Cynthia served as the first woman platoon leader in the 199th Infantry Motorized Regiment and Signal Platoon leader in the 2nd Armored Cavalry Regiment (ACR). Serving as an operations officer and minority admissions officer for West Point, Cynthia served as a distinguished company commander in Wonju, Korea in the First Signal Brigade. Cynthia resigned her Army commission to attend Duke Divinity School and graduated with a Masters of Divinity in 2000. Cynthia returned to the Army as a military chaplain and was the Distinguished Honor Graduate from the Army Chaplain School. She then served seven years as Associate Academy Chaplain at the United States Military Academy. During that time, she graduated from the Blanton Peale Institute with a Pastoral Counseling degree.

Cynthia was selected to serve as representative to the Defense Advisory Committee on Women in the Services (DACOWITS) advocating to end the combat exclusion policy for women.